

NAME Ciba Geigy
 I.D. # RID001194323
 FILE # 12-1B
 OTHER _____

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 29, 1982

Dr. James E. Crowley
 Ciba-Geigy Corporation
 Cranston Facility
 180 Mill Street
 Cranston, Rhode Island 02905

RE: EPA I.D. # RID001194323

Dear Dr. Crowley:

EPA is currently reviewing Ciba-Geigy Corporation's application under the Resource Conservation and Recovery Act for a permit to treat and store hazardous waste at the Cranston, Rhode Island facility. Due to the apparent discrepancies within the Part B application itself and between the Part B and the Part A submitted earlier, EPA cannot determine if the application is sufficient under 40 CFR 122.24 and 122.25 to allow a more technical review of the application. The following apparent discrepancies must be resolved to allow EPA to proceed with its completeness review:

1) The Part A includes drum storage capacity of 100,000 gallons, or approx. 2000 drums. The Part B indicates that the drum storage area has a capacity of 750 drums. The Part B closure plan anticipates a maximum of 2000 drums. The correct drum storage capacity must be specified to enable EPA to evaluate the adequacy of the secondary containment system and closure plan and also because any RCRA permit decision that is made will have to consider the maximum allowable drum storage.

If you contend that certain drum storage activities do not require RCRA permits due to the various RCRA exemptions (e.g. < 90 day storage, storage of nonlisted, hazardous waste prior to recycle, etc.), this should be indicated and the Part A and/or Part B amended accordingly.

2) The Part A includes tank storage capacity of 3,544,000 gallons whereas the Part B indicates that the tank storage capacity is 6000 gallons. The Part B closure plan anticipates a maximum of 44,000 gallons of hazardous "materials" stored in tanks. Furthermore, in the Training Plan submitted to Michelle Travers of EPA on February 20, 1981, you reference both a chlorinated solvent ~~EPOCH~~ in the main tank farm) and a nonchlorinated solvent tank (ST #5 in Building 21 tank farm) and also a spent sulfuric acid tank.

SYMBOL	and a nonchlorinated solvent tank (ST #5 in Building 21 tank farm) and also a spent sulfuric acid tank.
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DATE	11-22-82

Again, if you believe that certain of these tanks do not require RCRA permits for various reasons, this should be indicated and the Part A and/or Part B application amended accordingly.

3) The Part A includes tank treatment of 2,200,000 gpd capacity whereas the Part B does not reference the tank treatment process except in the closure plan. If you believe that this treatment process is excluded from RCRA permitting requirements under 40 CFR 122.21(d)(2), this should be indicated and the Part A and or Part B revised accordingly.

To summarize, the Parts A and B should clearly and consistently indicate the storage and treatment operations for which a Federal RCRA permit is required and sought. The clarification requested herein must be submitted within 15 days of receipt of this letter. If you have any questions in this matter, please contact me at (617)223-5630.

Very truly yours,

Richard A. Cavagnero
Environmental Engineer

cc: R.I. DEM

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